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September 20, 2024

September 30 conference is adjourned to  
December 6, 2024 at 11:00 a.m.  
Dial-In No.: 1-888-363-4749,  
Access Code: 3667981.  
SO ORDERED.  
Dated: 9/23/2024

Via ECF

Hon. P. Kevin Castel  
U.S. District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

  
P. Kevin Castel  
United States District Judge

Re: *NY Daily Newswire, LLC v. Tango Publishing Corporation d/b/a Tango Media*  
Case No: 1:24-cv-05597-PKC

Dear Judge Castel:

This firm represents plaintiff NY Daily Newswire, LLC ("*Plaintiff*") in the above-referenced matter and writes pursuant to Rule 1.C. of the Court's Individual Practices to respectfully request an adjournment of the September 30, 2024, Initial Pretrial Conference, along with the associated filing deadline(s) [Dkt. No. 7].

- i. The current date for the Initial Pretrial Conference is September 30, 2024, and the current submission deadline is September 20, 2024. [Dkt. No. 7];
- ii. Service upon defendant Tango Publishing Corporation d/b/a Tango Media ("*Defendant*") has not yet been effectuated and as such, Defendant has not yet appeared in this matter or filed a response to the Complaint. This firm had previously contacted Defendant's prior counsel from an earlier unrelated case to inquire into counsel's continued representation of Defendant however, prior counsel advised that they would not be representing Defendant at that time. Plaintiff will continue all efforts to serve process upon Defendant and anticipates service being effectuated within the time set forth in Rule 4(m) of the Federal Rules of Civil Procedure. Plaintiff seeks an adjournment of the Initial Pretrial Conference and the associated filing deadline(s) to a date following the completion of service upon Defendant;
- iii. No previous requests have been made or granted/denied;
- iv. Defendant has not yet appeared in this action and therefore neither opposes nor consents to this request;



- v. This request is made in good faith and not for purposes of delay and granting this request will not prejudice any party to this matter.

Thank you for your consideration of this request.

Respectfully submitted,

**SANDERS LAW GROUP**

/s Jaymie Sabilia-Heffert  
Jaymie Sabilia-Heffert, Esq.